



Federal Communications Commission
Washington, D.C. 20554

December 5, 2022

Francisco R. Montero
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RE: IB Docket No. 20-399: Spectrum Five, LLC – Petition for Enforcement of
Operational Limits and for Expedited Proceedings to Revoke Satellite Licenses

Dear Mr. Montero:

On November 6, 2020, Spectrum Five LLC (“Spectrum Five”) filed a Petition with the Federal Communications Commission (“Commission”) alleging, among other things, that the Netherlands administration’s satellite network, BSSNET4-95W, has priority at the International Telecommunication Union (“ITU”) over the United States administration’s satellite network, USASAT-60U, with respect to extended Ku-band frequencies (10.95-11.2 GHz) at 95 degrees west longitude (“95W”).¹ In response, Intelsat Licensee LLC (“Intelsat”) stated that “[f]or operations in the 10.95-11.2 GHz band, Intelsat 30 relies on BLUE1, a filing submitted by the administration of Papua New Guinea (‘PNG’)” which “has an earlier ITU date priority than that of the BSSNET4-95W.”² Similarly, Intelsat stated that “[l]ike Intelsat 30, Intelsat 31 operates against the pre-60U USASAT filings and the BLUE1 filing”³

On November 28, 2022, Intelsat filed in the above-captioned docket a letter from the National Information and Communications Technology Authority of the Government of Papua New Guinea directed to the Commission confirming that its BLUE1 satellite network filing was brought into use using the Intelsat 30 satellite and that the United States was informed about this arrangement and did not object.⁴

¹ See Spectrum Five, LLC, Petition for Enforcement of Operational Limits and for Expedited Proceedings to Revoke Satellite License, IB Docket No. 20-399 (filed Nov. 6, 2020), at 2-4.

² See Intelsat License LLC, Opposition, IB Docket No. 20-399 (filed Dec. 8, 2020) at 14.

³ *Id.* at 15.

⁴ See Letter from Jennifer D. Hindin, Counsel for Intelsat, to Ms. Marlene H. Dortch, Secretary, FCC, IB Docket No. 20-399 (Nov. 28, 2022) (attaching letter from Kila Gulo-Vui, Chief Executive Officer, National Information and Communications Technology Authority, Papua New Guinea to Karl Kensinger, International Bureau, FCC (Nov. 18, 2022)).

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To the extent Spectrum Five would like to respond to this submission, we ask that you do so no later than December 20, 2022.

Sincerely,

/s/William R. Richardson, Jr.

William R. Richardson, Jr.

Deputy Associate General Counsel

Office of the General Counsel

cc: Jennifer D. Hindin, Counsel for Intelsat (JHindin@wiley.law)